

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION**

State Farm Fire and Casualty Company,

Plaintiff,

v.

First Financial of Charleston, Inc., and Otha
Delaney, individually and on behalf of all others
similarly situated,

Defendants.

**PLAINTIFF'S ANSWERS TO LOCAL
RULE 26.01 INTERROGATORIES**

C.A. No. 2:23-cv-263-RMG

Plaintiff, State Farm Fire and Casualty Company ("State Farm"), hereby submits its answers to the Court's interrogatories pursuant to Rule 26.01 of the Local Rules of the United States District Court for the District of South Carolina.

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: At this time, State Farm is not aware of any persons or legal entities who may have a subrogation interest in this matter.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: To the extent that the issues involve the interpretation of the insurance policy at issue, those are legal issues which should be tried by the court.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the

outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: State Farm is a wholly owned subsidiary of State Farm Mutual Automobile Insurance Company, its parent. As a mutual insurance company, State Farm Mutual Automobile Insurance Company has no stock and is not a publicly traded corporation. No publicly held company owns 10% or more of State Farm's stock.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: This declaratory judgment action is filed in the division which includes the county in which the underlying lawsuit was filed.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: No.

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Not applicable.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Not applicable.

(H) In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court’s jurisdiction under § 1332(a).

ANSWER: State Farm is an insurance company organized and existing under the laws of the State of Illinois, with its principal place of business in the State of Illinois.

January 19, 2023

s/Jennifer E. Johnsen

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